



June 28, 2023

VIA ECF

U.S. Magistrate Judge Andrew M. Edison
United States District Court
Southern District of Texas
601 Rosenberg, Seventh Floor
Galveston, TX 77550

Re: *In re Apache Corp. Sec. Litig.*, No. 4:21-cv-00575 (S.D. Tex.)

Dear Judge Edison,

We write because the parties wish to update the Court that they have completed their Search Protocol negotiations pursuant to the Court's Docket Control Order (ECF No. 86, ¶8) and Order dated April 10, 2023 (ECF No. 103).¹ Given that the parties have reached agreement on the Search Protocol, under the operative case schedule the deadline for substantial completion of document production is November 27, 2023 (*i.e.*, 150 days after the date of this filing), and the fact discovery cut-off is December 1, 2023.

Respectfully submitted,

/s/ Johnston de F. Whitman, Jr.

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¹ The negotiations concerned search terms for Defendants' use in searching files of individual document custodians, but did not address searches of central files, shared sources of electronically stored information, or paper files.

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